

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE:</b>	:	
Ertan Erden	:	Chapter 13
	:	Case No. 20-12746-ELF
Debtor(s)	:	

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**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY**  
**FILED BY AMERICAN HERITAGE CREDIT UNION**

Debtor, Ertan Erden, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by American Heritage Credit Union and hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtor asks for the chance to catch up.
7. Admitted payments were missed. Debtor asks for the chance to catch up.
8. Denied.
  - a. Denied.
9. Debtor opposes the same.
10. Denied.
11. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: July 12, 2022

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West, Esq.**  
Standing Chapter 13 Trustee  
Electronic Notice

**Rebecca A. Solarz, Esq.**  
Attorney for Movant *Nationstar Mortgage LLC*.  
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: July 12, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107